

# MEMO ENDORSED



JAMES E. JOHNSON  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

MARTIN BOWE  
Senior Counsel  
Tel: (212) 356-0894  
Cell: (646) 498-7178

**VIA ECF**

Edgardo Ramos  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007  
(212) 805-4590  
NathanNYSChambers@nysd.uscourts.gov

The November 18, 2020 conference is hereby adjourned. The parties are directed to submit a joint status letter by December 11, 2020. The Clerk of Court is respectfully directed to terminate the motion. Doc. 14.

So ordered.

Edgardo Ramos, U.S.D.J

Dated: 11/16/2020

New York, New York

Re: *Y.G. and Y.G. obo T.G. v. N.Y.C. Dep't of Educ.*, 20-cv-4848 (ER)(OTW)

Dear Judge Ramos:

I am Assistant Corporation Counsel in the office of Corporation Counsel James E. Johnson, supervising attorney for Defendant in the above-referenced action wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write on behalf of all parties to respectfully request an adjournment of the conference scheduled for November 18, 2020, *sine die*, and to propose that the parties submit a status letter no later than December 11, 2020 **informing the Court the case has been fully resolved, or, that the parties wish to proceed to either a settlement conference with Magistrate Judge Wang, or a briefing schedule to be proposed at that time.** This is the first request for an adjournment of the initial conference. The need for the extension is provide the parties with additional time to work toward settlement, and the parties are hopeful this case will fully resolve without the need to burden the Court further.

Accordingly, the parties respectfully request that the conference scheduled for November 18, 2020, be adjourned *sine die*, and that a status letter be due no later than December 11, 2020.

Thank you for considering this request.

Respectfully submitted,

/s/

Martin Bowe  
Senior Counsel

cc: Adam Dayan, Esq (via ECF)